



**SKIFF
LAW**

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August 22, 2019

Via Facsimile (973.645.4549)

Honorable Joseph A. Dickson
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Court Room MLK 2D
Newark, New Jersey 07101

***Re: Marimar Textiles, Inc. v. Jude Connally, et al.
United States District Court, District of New Jersey
Civil Action Number 2:17-cv-02900-JLL-JAD***

Dear Judge Dickson:

This Firm represents plaintiff Marimar Textiles, Inc. (“**Marimar**”) with respect to the above action.

I write to request a conference with Your Honor to address various discovery disputes that, despite counsels’ attempts through various meet-and-confer sessions and multiple correspondence, remain unresolved. Further, with these disputes outstanding and the discovery deadline of August 31, 2019 rapidly approaching, we respectfully request an extension of **60 days** to conclude fact discovery. Marimar needs the additional time to receive Defendants’ supplemental production, review it for further deficiencies, receive any additional documents, and prepare for depositions of Defendants. Defendants’ counsel consents to our request for a conference.

Thank you for your time and consideration of this matter.

Respectfully,

SKIFF LAW FIRM LLC

Gregory J. Skiff

cc: Marc Haefner, Esq. (via CM/ECF)

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By Appointment

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